

1 catalog to refresh your memory as to the cost of things or
2 the existence of the particular item in your Rainbow Inn?

3 A. I don't understand what you're asking me.

4 Q. Well, were you looking through the catalog to see
5 things that restaurants have?

6 A. No. If you follow the list down -- as I look at
7 this now, the whole thing makes me I ill. I could have
8 visualized walking in the door of the dining room and pretty
9 much tell you what was in that room. And that's why the
10 order is -- I'm assuming. It's been a long time since I did
11 that. The order's a little crazy. You've got a brass wall
12 decoration stuck in the middle of forks and spoons. But I
13 could walk that room, you know, and tell you what was in each
14 area. And that's pretty much why it looks the way it does.

15 Q. Okay. And then how about the quantities of the
16 items that are listed? Did you use anything to help you
17 determine that, or is that from memory?

18 A. That's also from memory.

19 Q. And how about the column that's entitled, Price
20 Each, or Ea., on Exhibit A? Was that something you used the
21 restaurant book for, or was that something that you
22 recollect?

23 A. Well, sometimes I remembered, because I had
24 purchased the items, and I recalled -- I mean, I'm -- I would
25 say -- I'm sure if you asked me what my blouse cost, I could

1 say \$25. Some items I would recall, other items I wouldn't
2 recall and would use some means of remembering.

3 Q. And the price column that you have there, that
4 would be, for example, the price that you paid for it upon
5 purchase, to the best of your recollection?

6 A. Yes. I would assume.

7 Q. Were you the only person that worked out the
8 inventory?

9 A. Yes.

10 Q. While we're working on inventories, let me show you
11 Exhibits B and C, which are two more inventories.

12 A. Yes.

13 Q. Okay. Do you recognize those documents?

14 A. Yes, I do.

15 Q. Are they inventories that you prepared similar to
16 the fashion you just described for us about Exhibit A?

17 A. Yes.

18 Q. And did you use anything to -- for example, with
19 Inventory, Exhibit B, which consists of four pages that have
20 been Bates marked 003- -- well, I've got two of them here.
21 It consists of two pages and they're Bates marked 0038 and
22 0039. Exhibit B is entitled, Rainbow Inn Liquor Inventory.
23 How is it you determined the quantities of liquor?

24 A. How did I? I determined them because this is
25 usually what I would keep in order, in stock, and replace

1 when a bottle was empty. For instance, I'll just pick one,
2 Old Grand Dad, I don't need more than one bottle. I mean, I
3 know what I would sell and what I wouldn't sell, and that's
4 what I would stock. You see the line that says, Canadian
5 Club, for instance. I have three listed because that is a
6 whiskey I would sell. Particularly at that time of the year
7 when we were in the midst of hunting season and I have people
8 that were -- more people in the restaurant than usual.

9 Q. Okay. Did you use any documents, invoices or
10 anything to make the Exhibit B Liquor Inventory list, or is
11 it from memory?

12 A. I used the Pennsylvania State Liquor Catalog.
13 Liquor pricing is controlled in Pennsylvania, so no matter
14 what catalog from where you pick it up, it's going to be the
15 same price. And I got that catalog from the local liquor
16 store.

17 Q. Okay. But as to quantities that are listed on
18 Exhibit B, the liquor inventory list, did you use any
19 invoices or anything to refresh your memory?

20 A. They were all destroyed. As I said, I used my own
21 judgment because this is what I would have kept in stock.

22 Q. Okay. Exhibit C, we've marked Exhibit C, and it's
23 entitled, Rainbow Inn Food and Beer Inventory. It has been
24 stamped pages 0040 and 0041.

25 A. Right.

1 Q. Two pages. And this also is a list that you have
2 prepared of inventory of beer and food?

3 A. That's correct.

4 Q. And how did you determine -- was it from memory
5 again, the list of items of beer and food on the inventory?

6 A. That's correct.

7 Q. And quantities, was that by memory or by reference
8 to some documents?

9 A. I had no documents. It was from memory.

10 Q. And pricing, how did you determine that? Did you
11 get a catalog or was that by memory?

12 A. Yes. We ordered all of our -- well, not all of it.
13 Some of it, I -- some of these items I would pickup from a
14 local grocery store. So in order to get a price for
15 Coffeemate, I took a price off a grocery store shelf. Other
16 items, we ordered from a distributor and I would have had a
17 catalog with that kind of pricing in it. Many of these items
18 are grocery store items.

19 Q. I'm going to give you what I've premarked
20 Defendant's Exhibit D, E, F, G, and H, and ask you to take a
21 look at those. Do you recognize those exhibits?

22 A. Yes. This is our 2002 tax return.

23 Q. Okay. That's for the Walter Beck Corporation?

24 A. Correct.

25 Q. And does that consist of the -- well, Exhibit D,